

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA  
(HARRISBURG)**

<b>IN RE:</b>	:	
	:	<b>CHAPTER 13</b>
<b>ANGELA L. SELL,</b>	:	
<b>Debtor</b>	:	<b>Case No. 1:18-bk-01406-HWV</b>
	:	
<b>U.S. Bank Trust National Association</b>	:	
<b>as Trustee of Cabana Series III Trust,</b>	:	
<b>Movant</b>	:	
	:	
<b>v.</b>	:	
	:	
<b>ANGELA L. SELL,</b>	:	
<b>Debtor/Respondent</b>	:	

**ANSWER TO MOTION OF THE CHALET PROPERTIES III, LLC FOR  
RELIEF FROM THE AUTOMATIC STAY AND CO-DEBTOR STAY AS TO  
REALTY KNOWN AS 58 ALLEN DRIVE, HANOVER, PA 17331**

AND NOW COMES Debtor, Angela L. Sell, by and through her undersigned counsel,  
answering the Motion of Chalet Properties III, LLC for Relief from the Automatic Stay as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Denied. The Proof of Claim speaks for itself.
8. Admitted.
9. Admitted.

10. Admitted.

11. Denied. Debtor desires to maintain her personal residence. Debtor can become current in a reasonable period of time.

12. Denied. Debtor desires to maintain her personal residence. Debtor can become current in a reasonable period of time.

13. Admitted.

14. Denied. Debtor desires to maintain her personal residence. Debtor can become current in a reasonable period of time.

15. Denied. The Federal Rules of Bankruptcy Procedure speak for themselves.

16. Admitted.

WHEREFORE, Debtor respectfully requests the Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

LAW OFFICES OF CRAIG A. DIEHL

Dated: April 1, 2020

By: /s/ Craig A. Diehl, Esquire, CPA

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